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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

2009 OCT 29 P 12:44

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

OCT 29 2009

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IN THE MATTER OF THE APPLICATION OF
LITCHFIELD PARK SERVICE COMPANY, AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE OF
ITS UTILITY PLANTS AND PROPERTY AND
FOR INCREASES IN ITS WASTEWATER
RATES AND CHARGES FOR UTILITY
SERVICE BASED THEREON.

DOCKET NO. SW-01428A-09-0103

IN THE MATTER OF THE APPLICATION OF
LITCHFIELD PARK SERVICE COMPANY, AN
ARIZONA CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE OF
ITS UTILITY PLANTS AND PROPERTY AND
FOR INCREASES IN ITS WATER RATES AND
CHARGES FOR UTILITY SERVICE BASED
THEREON.

DOCKET NO. W-01427A-09-0104

**WESTCOR/GLOBE'S
REPLY TO RESPONSE TO MOTION
TO INTERVENE**

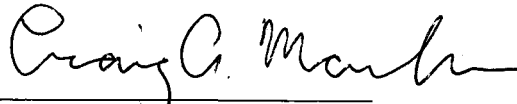
1 Westcor/Goodyear LLC ("Westcor") and Globe Land Investors, L.L.C. ("Globe")
2 (together "Westcor/Globe"), hereby reply to the "Response to Motion to Intervene" filed by
3 Litchfield Park Service Company ("LPSCO"). LPSCO opposes Westcor/Globe's Motion to
4 Intervene. LPSCO's opposition is meritless and should be rejected.

5 The Motion to Intervene states that Westcor/Globe is developing Estrella Falls, a huge
6 mixed-use land development that will be provided water and wastewater service by LPSCO.
7 The rates set in this case will apply to LPSCO's service to Estrella Falls. This alone is sufficient
8 basis for Westcor/Globe's intervention.

9 In the second sentence of its pleading, LPSCO misstates Westcor/Globe's basis for
10 intervention. LPSCO erroneously states that Westcor/Globe's "sole basis for intervening" is
11 that no additional hook-up fees should be paid to LPSCO. It is true that the Motion to Intervene

1 did note Westcor/Globe's particular interest in one issue — the applicability of future hook-up
2 fees that may be approved in this case — but it did not state that this was the only issue of
3 interest to Westcor/Globe. In fact, the Motion explicitly stated that "Westcor/Globe reserves the
4 right to take positions on any other issues in this case."

5 RESPECTFULLY SUBMITTED on October 29, 2009.
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19 **Original** and 15 copies **filed**
20 on October 29, 2009, with:

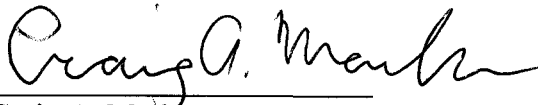
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27 **Copy** of the foregoing **mailed**
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